

# Remedium

April 13, 2010

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U.S. Environmental Protection Agency  
EPR-SR  
1595 Wynkoop Street  
Denver, CO 80202

Attn.: Ms. Bonita Lavelle

Subject: OU3 RI/FS of the Libby Asbestos Site  
Monthly Progress Report – March 2010

Dear Bonnie:

This progress report describes work completed during the month of March 2010, in accordance with Section IX of the Administrative Settlement Agreement and Order on Consent for Remedial Investigation/Feasibility Study dated September 2007. A discussion of the actions taken, sampling results, planned activities, modifications, problems encountered, potential issues, anticipated delays, and solutions developed is provided below. Information by contractor is reported separately.

## **MWH**

The following is a summary of the actions taken and progress made during March 2010.

### **A. ACTIONS TAKEN**

- Reviewed and commented on draft Phase IV ABS scripts.
- Participated in a conference call with EPA and SRC on Phase IV ABS scripts on March 1, 2010.
- Sent ISCO automated samplers/flow-rate loggers to manufacturer for software modification to prevent data purging at freezing temperatures.
- Continued preparation of initial sections of the OU3 Remedial Investigation Report.

### **B. SAMPLING RESULTS**

None.

### **C. PLANNED ACTIVITIES FOR NEXT TWO MONTHS**

The following tasks are scheduled to be performed over the next two months.

- Continue preparation of the OU3 Remedial Investigation Report.

- Review and comment on draft and draft final ABS scripts and Phase IV Sampling and Analysis Plan(s) as they are issued by EPA.
- Re-install cold-temperature-modified ISCO automated samplers/flow-rate loggers at stations CC-02, LRC-02 and LRC-06, begin flow-rate measurement/recording on April 6, 2010.
- Participate in teleconferences and other meetings as requested by EPA.

D. MODIFICATIONS/PROBLEMS ENCOUNTERED/POTENTIAL  
ISSUES/ANTICIPATED DELAYS/SOLUTIONS DEVELOPED/IMPLEMENTED

None.

Parametrix

The following is a summary of the actions taken and progress made during the month of March 2010.

A. ACTIONS TAKEN

- Continued small mammal data analysis.
- Initiated QC review of histology draft report.
- Continued preparation of 2009 Small Mammal Program data report.
- Responded to EPA comments on 2009 Aquatic Program data report.
- Finalized, submitted 2009 Aquatic Program data report to Remedium, EPA.
- Conference calls with Bill Stubblefield on development of bioassay and analytical study recommendation memo.
- Continued financial reporting, supervision and project management activities.

B. PLANNED ACTIVITIES FOR NEXT TWO MONTHS

The following tasks are scheduled to be performed over the next two months:

- Participate on a BTAG conference call to discuss the 2009 Aquatic Program data report and recommendations (if any) for additional aquatic field work.
- Prepare and submit BTAG Subgroup recommendations memo (analytical, bioassay recommendations).
- Participate on a BTAG conference call to review subgroup analytical and bioassay recommendations.
- Finalize review of draft histology report.
- Finalize small mammal data analysis.
- Submit draft report for 2009 Small Mammal Program to Remedium, EPA.

C. MODIFICATIONS/PROBLEMS ENCOUNTERED/POTENTIAL ISSUES/  
ANTICIPATED DELAYS/SOLUTIONS DEVELOPED/IMPLEMENTED

The BTAG subgroup identified concerns with the analytical method(s) used for asbestos in surface water with regard to the reporting of clumped versus free fibers and resulting implications of the method(s) to providing an understanding and basis for understanding fiber fate and evaluating aquatic exposure (and potential toxicity) in a planned bioassay. The Subgroup is continuing its work on providing recommendations for addressing analytical method short comings and addressing analytical/fiber fate challenges in the conduct of a trout toxicity bioassay that will likely be recommended.

If you have any questions regarding this progress report please contact Bob Marriam at (901) 820-2023.

Sincerely,



Robert J. Medler  
Project Coordinator  
Remedium Group, Inc.

cc: Michael DeDen - MWH  
Lynne Gardner - Grace  
John Garr - MWH  
Robert Marriam - Grace  
Sue Robinson - Parametrix  
Dick Sloan - Montana DEQ